Steven T. Potts
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Attorney for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
GREAT FALLS DIVISION

UNITED STATES OF AMERICA,	)	
	)	**Case No. CR-19-20-GF-BMM**
Plaintiff,	)	
	)	**MEMORANDUM IN SUPPORT**
vs.	)	**OF MOTION FOR DETENTION**
	)	**HEARING**
JAMES EDWARD SNELL, JR.,	)	
	)	
Defendant.	)	
	)	

Defendant has moved the Court for a detention hearing. The Bail Reform

Act requires the pretrial detention of a defendant only if a judicial officer

determines that no conditions or combination of conditions exist which will

"reasonably assure the appearance of the person," see United States v. Xulam, 84

F.3d 441, 442 (D. C. Cir. 1996) (per curiam), and "the safety of any other person

and the community." United States v. Rodriguez, 897 F. Supp. 1461, 1463 (S. D.

Fla. 1995); 18 U.S.C. § 3142(c). The government has the burden of proof, and a

hearing will show that neither basis for detention exists here.

DATED this 19th day of April, 2019.

STEVEN T. POTTS, PLLC

By___/s/ Steven T. Potts_____
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CERTIFICATE OF COMPLIANCE

Pursuant to Local Rule, this certifies that the body of the attached memorandum contains 105 words, excluding the caption and certificate of compliance.

_____/s/ Steven T. Potts_____

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 19th day of April, 2019, the foregoing was served upon the persons named below by mailing, hand-delivery, Federal Express, or by electronic transmission as indicated:

1.
Clerk of U.S. District Court

_____ U.S. Mail
_____ Federal Express
_____ Hand delivery
_____ Facsimiletransmission
1, 2   CM/ECF

2.
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